			FILED IN CLERKS OFFICE
UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS		2005 OCT 20 ₱ 1: 33	
		·	U.S. DISTRICT COURT DISTRICT OF MASS.
M ² CONSULTING, INC., v. MRO SOFTWARE, INC.	Plaintiff,)))) (Civil Action No.))	03-12589-GAO
	Defendant.)))	

JOINT MOTION TO MODIFY SCHEDULING ORDER

The parties submit this Joint Motion to Modify the Scheduling Order in this matter as follows:

- Change the existing October 31, 2005 deadline for the completion of fact discovery, to November 31, 2005;
- Move the deadline for M2's expert report to December 30, 2005;
- Modify the deadline for MRO's expert report to January 31, 2006; and
- Change the deadline for the completion of all expert witness depositions to February 28, 2006.

As grounds for this motion, the parties state as follows:

- 1. Fact discovery in this matter is scheduled to conclude on October 31, 2005.
- 2. To date, the parties have taken several depositions in this case and are currently attempting to resolve a number of discovery disputes.
- 3. The parties are also discussing the possibility of engaging in mediation.
- Accordingly, the Court should extend the deadline for the conclusion of fact discovery and modify the other Scheduling Order deadlines as necessary.

MRO Software, Inc.

By its Attorneys

Gesmer Updegrove LLP

Kurt Bratten, Esq. (BB)# 644730

Gesmer Updegrove LLP

40 Broad Street

Boston, MA 02109

(617) 350-6800

October 20, 2005

M2 Consulting, Inc.

By its Attorneys

Fee, Rosse & Lanz, P.C.

Mark S. Resnick, Esq. (BBO#/559885) Fee, Rosse & Lanz, P.C.

321 Boston Post Road

Sudbury, MA 01776

(978) 440-7000